

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE WILMINGTON TRUST SECURITIES  
LITIGATION

Master File No. 10-cv-00990-ER

(Securities Class Action)

Hon. Eduardo C. Robreno

This document relates to: ALL ACTIONS

**PROOF OF SERVICE OF NOTICE  
OF SETTLEMENT UNDER CLASS ACTION FAIRNESS ACT**

Defendants Wilmington Trust Corporation, J.P. Morgan Securities LLC (f/k/a J.P. Morgan Securities Inc.), Keefe, Bruyette & Woods, Inc., David Gibson, Robert Harra, Jr., William North, Kevyn Rakowski, Ted Cecala, Carolyn Burger, R. Keith Elliott, Donald Foley, Louis Freeh, Gailen Krug, Rex Mears, Stacey Mobley, Michelle Rollins, Oliver Sockwell, Robert Tunnell, Jr., and Susan Whiting, pursuant to the Court's Order Preliminarily Approving Settlements and Providing for Notice (the "Order") (D.I. 825 at § 7) and through their respective undersigned counsel, submit this Proof of Service of Notice of Settlement Under Class Action Fairness Act, and state as follows:

1. On July 10, 2018, the Court entered the Order and required Defendants to submit "proof, by affidavit or declaration" of compliance with the notice requirements of the Class Action Fairness Act (the "Act"). See 28 U.S.C. § 1715.

2. Pursuant to the Court's Order, the Declaration of Stephanie J. Fiereck, Esquire, of Epiq Class Action & Claims Solutions Inc. is attached as **Exhibit 1**. Ms. Fiereck's Declaration confirms that on June 4, 2018, the appropriate federal and state government officials were sent notice of the settlement of this action as required by the Act.

Dated: July 17, 2018

Respectfully submitted,

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***Counsel for Defendant Ted T. Cecala***

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17th day of July 2018, I served a copy of the foregoing Proof of Service of Notice of Settlement Under Class Action Fairness Act using the Court's CM/ECF system.

/s/ Jamie L. Edmonson  
Jamie L. Edmonson (Bar No. 4247)

## **Exhibit 1**

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

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**IN RE WILMINGTON TRUST  
SECURITIES LITIGATION**

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This document relates to: ALL ACTIONS

Master File No. 10-cv-00990-ER

(Securities Class Action)

Hon. Eduardo Robreno

**DECLARATION OF STEPHANIE J. FIERECK, ESQ.  
ON IMPLEMENTATION OF CAFA NOTICE**

I, STEPHANIE J. FIERECK, ESQ., hereby declare and state as follows:

1. My name is Stephanie J. Fiereck, Esq. I am over the age of 21 and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.
2. I am the Legal Notice Manager for Epiq Class Action & Claims Solutions Inc. (“Epiq”), a firm that specializes in designing, developing, analyzing and implementing large-scale, un-biased, legal notification plans.
3. Epiq is a firm with more than 20 years of experience in claims processing and settlement administration. Epiq’s class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment of fulfillment services, receipt and processing of opt-outs, coordination with the United States Postal Service, claims database management, claim adjudication, funds management and distribution services.
4. The facts in this Declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues at Epiq.

**DECLARATION OF STEPHANIE J. FIERECK, ESQ.  
ON IMPLEMENTATION OF CAFA NOTICE**

### **CAFA NOTICE IMPLEMENTATION**

5. At the direction of counsel for the Defendants Wilmington Trust Corp.; J.P. Morgan Securities LLC; Keefe, Bruyette & Woods, Inc.; David R. Gibson; Robert V.A. Harra, Jr.; William North; Kevyn N. Rakowski; Ted T. Cecala; Carolyn S. Burger; R. Keith Elliott; Donald E. Foley; Gailen Krug; Stacey J. Mobley; Michele M. Rollins; Oliver R. Sockwell; Robert W. Tunnell, Jr.; Susan D. Whiting; Rex L. Mears; and Louis Freeh, 63 officials, which included the Attorney General of the United States and the Attorneys General of each of the 50 states, the District of Columbia and U.S. Territories and six banking and regulatory offices were identified to receive the CAFA notice.

6. Epiq maintains a list of most of these state and federal officials with contact information for the purpose of providing CAFA notice. Prior to mailing, all the names and addresses were verified, then run through the Coding Accuracy Support System (“CASS”) maintained by the United States Postal Service (“USPS”).<sup>1</sup>

7. On June 4, 2018, Epiq sent 63 CAFA Notice Packages (“Notice”). The Notice was mailed by certified mail to 62 officials, including the Attorneys General of each of the 50 states, the District of Columbia and the U.S. Territories and six banking and regulatory offices. The Notice was also sent by United Parcel Service (“UPS”) to the Attorney General of the United States. The CAFA Notice Service List (USPS Certified Mail and UPS) is attached hereto as **Attachment 1**.

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<sup>1</sup> CASS improves the accuracy of carrier route, 5-digit ZIP®, ZIP + 4® and delivery point codes that appear on mail pieces. The USPS makes this system available to mailing firms who want to improve the accuracy of postal codes, i.e., 5-digit ZIP®, ZIP + 4®, delivery point (DPCs), and carrier route codes that appear on mail pieces.

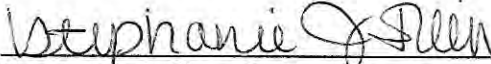


8. The materials sent to the Attorneys General and the banking and regulatory officials included a cover letter which provided notice of the proposed settlement of the above-captioned case. The cover letter is attached hereto as **Attachment 2**.

9. The cover letter was accompanied by a CD, which included the following:

- a. Consolidated Securities Class Action Complaint and three (3) Amended Consolidated Securities Class Action Complaints (with exhibits);
- b. Lead Plaintiffs' Unopposed Motion for Preliminary Approval of Settlements and Approval of Notice to the Class, with all exhibits thereto, including:
  1. Stipulation and Agreement of Settlement with Wilmington Trust Defendants and Underwriter Defendants (with exhibits);
  2. [Proposed] Order Preliminarily Approving Settlements and Providing for Notice (with exhibits);
  3. Forms of Notice;
  4. [Proposed] Judgment Approving Class Action Settlement with Wilmington Trust Defendants and Underwriter Defendants;
  5. Stipulation and Agreement of Settlement with KPMG (with exhibits);
  6. [Proposed] Judgment Approving Class Action Settlement with KPMG; and
- c. Brief in Support of Lead Plaintiffs' Unopposed Motion for Preliminary Approval of Settlements and Approval of Notice to the Class.

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
June 21, 2018.

  
Stephanie J. Fiereck, Esq.

**DECLARATION OF STEPHANIE J. FIERECK, ESQ.  
ON IMPLEMENTATION OF CAFA NOTICE**

# Attachment 1

CAFA Notice Service List  
UPS

| Company                  | FullName      | Address1                | Address2 | City       | State | Zip   | Zip4 |
|--------------------------|---------------|-------------------------|----------|------------|-------|-------|------|
| US Department of Justice | Jeff Sessions | 950 Pennsylvania Ave NW |          | Washington | DC    | 20530 |      |

## CAFA Notice Service List

## USPS Certified Mail

| Company                                   | FullName                                  | Address1                              | Address2                             | City           | State | Zip   |
|---|---|---------------------------------------|--------------------------------------|----------------|-------|-------|
| Office of the Attorney General            | Jahna Lindemuth                           | PO Box 110300                         |                                      | Juneau         | AK    | 99811 |
| Office of the Attorney General            | Steve Marshall                            | 501 Washington Ave                    |                                      | Montgomery     | AL    | 36104 |
| Office of the Attorney General            | Leslie Carol Rutledge                     | 323 Center St                         | Suite 200                            | Little Rock    | AR    | 72201 |
| Office of the Attorney General            | Mark Brnovich                             | 2005 N Central Ave                    |                                      | Phoenix        | AZ    | 85004 |
| Office of the Attorney General            | CAFA Coordinator                          | Consumer Law Section                  | 455 Golden Gate Ave Ste 11000        | San Francisco  | CA    | 94102 |
| Office of the Attorney General            | Cynthia Coffman                           | Ralph L Carr Colorado Judicial Center | 1300 Broadway 10th Fl                | Denver         | CO    | 80203 |
| Office of the Attorney General            | George Jepsen                             | 55 Elm St                             |                                      | Hartford       | CT    | 06106 |
| Office of the Attorney General            | Karl A. Racine                            | 441 4th St NW                         |                                      | Washington     | DC    | 20001 |
| Office of the Attorney General            | Matt Denn                                 | Carvel State Office Bldg              | 820 N French St                      | Wilmington     | DE    | 19801 |
| Office of the Attorney General            | Pam Bondi                                 | State of Florida                      | The Capitol PL-01                    | Tallahassee    | FL    | 32399 |
| Office of the Attorney General            | Chris Carr                                | 40 Capitol Square SW                  |                                      | Atlanta        | GA    | 30334 |
| Department of the Attorney General        | Russell Suzuki                            | 425 Queen St                          |                                      | Honolulu       | HI    | 96813 |
| Iowa Attorney General                     | Thomas J Miller                           | 1305 E Walnut St                      |                                      | Des Moines     | IA    | 50319 |
| Office of the Attorney General            | Lawrence G Wasden                         | 700 W Jefferson St Ste 210            | PO Box 83720                         | Boise          | ID    | 83720 |
| Office of the Attorney General            | Lisa Madigan                              | 100 W Randolph St                     |                                      | Chicago        | IL    | 60601 |
| Indiana Attorney General's Office         | Curtis T Hill Jr                          | Indiana Government Center South       | 302 W Washington St 5th Fl           | Indianapolis   | IN    | 46204 |
| Office of the Attorney General            | Derek Schmidt                             | 120 SW 10th Ave 2nd Fl                |                                      | Topeka         | KS    | 66612 |
| Office of the Attorney General            | Andy Beshear                              | Capitol Ste 118                       | 700 Capitol Ave                      | Frankfort      | KY    | 40601 |
| Office of the Attorney General            | Jeff Landry                               | 1885 N Third St                       |                                      | Baton Rouge    | LA    | 70802 |
| Office of the Attorney General            | Maura Healey                              | 1 Ashburton Pl                        |                                      | Boston         | MA    | 02108 |
| Office of the Attorney General            | Brian E. Frosh                            | 200 St Paul Pl                        |                                      | Baltimore      | MD    | 21202 |
| Office of the Attorney General            | Janet T Mills                             | 6 State House Sta                     |                                      | Augusta        | ME    | 04333 |
| Department of Attorney General            | Bill Schuette                             | PO Box 30212                          |                                      | Lansing        | MI    | 48909 |
| Office of the Attorney General            | Lori Swanson                              | 445 Minnesota St                      | Suite 1400                           | St Paul        | MN    | 55101 |
| Missouri Attorney General's Office        | Josh Hawley                               | PO Box 899                            |                                      | Jefferson City | MO    | 65102 |
| MS Attorney General's Office              | Jim Hood                                  | Walter Sillers Bldg                   | 550 High St Ste 1200                 | Jackson        | MS    | 39201 |
| Office of the Attorney General            | Tim Fox                                   | Department of Justice                 | PO Box 201401                        | Helena         | MT    | 59620 |
| Attorney General's Office                 | Josh Stein                                | 9001 Mail Service Ctr                 |                                      | Raleigh        | NC    | 27699 |
| Office of the Attorney General            | Wayne Stenehjem                           | State Capitol                         | 600 E Boulevard Ave Dept 125         | Bismarck       | ND    | 58505 |
| Nebraska Attorney General                 | Doug Peterson                             | 2115 State Capitol                    |                                      | Lincoln        | NE    | 68509 |
| Office of the Attorney General            | Gordon MacDonald                          | NH Department of Justice              | 33 Capitol St                        | Concord        | NH    | 03301 |
| Office of the Attorney General            | Gurbir S Grewal                           | 8th Fl West Wing                      | 25 Market St                         | Trenton        | NJ    | 08625 |
| Office of the Attorney General            | Hector Balderas                           | 408 Galisteo St                       | Villagra Bldg                        | Santa Fe       | NM    | 87501 |
| Office of the Attorney General            | Adam Paul Laxalt                          | 100 N Carson St                       |                                      | Carson City    | NV    | 89701 |
| Office of the Attorney General            | Barbara Underwood                         | The Capitol                           |                                      | Albany         | NY    | 12224 |
| Office of the Attorney General            | Mike DeWine                               | 30 E Broad St 14th Fl                 |                                      | Columbus       | OH    | 43215 |
| Office of the Attorney General            | Mike Hunter                               | 313 NE 21st St                        |                                      | Oklahoma City  | OK    | 73105 |
| Office of the Attorney General            | Ellen F Rosenblum                         | Oregon Department of Justice          | 1162 Court St NE                     | Salem          | OR    | 97301 |
| Office of the Attorney General            | Josh Shapiro                              | 16th Fl Strawberry Square             |                                      | Harrisburg     | PA    | 17120 |
| Office of the Attorney General            | Peter Kilmartin                           | 150 S Main St                         |                                      | Providence     | RI    | 02903 |
| Office of the Attorney General            | Alan Wilson                               | Rembert Dennis Office Bldg            | 1000 Assembly St Rm 519              | Columbia       | SC    | 29201 |
| Office of the Attorney General            | Marty J Jackley                           | 1302 E Hwy 14 Ste 1                   |                                      | Pierre         | SD    | 57501 |
| Office of the Attorney General            | Herbert H. Slatery III                    | PO Box 20207                          |                                      | Nashville      | TN    | 37202 |
| Office of the Attorney General            | Ken Paxton                                | 300 W 15th St                         |                                      | Austin         | TX    | 78701 |
| Office of the Attorney General            | Sean D. Reyes                             | Utah State Capitol Complex            | 350 North State St Ste 230           | Salt Lake City | UT    | 84114 |
| Office of the Attorney General            | Mark R. Herring                           | 202 North Ninth Street                |                                      | Richmond       | VA    | 23219 |
| Office of the Attorney General            | TJ Donovan                                | 109 State St                          |                                      | Montpelier     | VT    | 05609 |
| Office of the Attorney General            | Bob Ferguson                              | 800 Fifth Avenue                      | Suite 2000                           | Seattle        | WA    | 98104 |
| Office of the Attorney General            | Brad D. Schimel                           | PO Box 7857                           |                                      | Madison        | WI    | 53707 |
| Office of the Attorney General            | Patrick Morrissey                         | State Capitol Complex                 | Bldg 1 Room E 26                     | Charleston     | WV    | 25305 |
| Office of the Attorney General            | Peter K Michael                           | 2320 Capitol Avenue                   |                                      | Cheyenne       | WY    | 82002 |
| Department of Legal Affairs               | Talauega Eleasalo V. Ale                  | Executive Office Building             | 3rd Floor                            | Pago Pago      | AS    | 96799 |
| Attorney General Office of Guam           | Elizabeth Barrett-Anderson                | ITC Building                          | 590 S Marine Corps Dr Ste 901        | Tamuning       | GU    | 96913 |
| Office of the Attorney General            | Edward Manibusan                          | Administration Bldg                   | PO Box 10007                         | Saipan         | MP    | 96950 |
| PR Department of Justice                  | Wanda Vazquez Garced                      | Apartado 9020192                      |                                      | San Juan       | PR    | 00902 |
| Department of Justice                     | Claude Walker                             | 34-38 Kronprindsens Gade              | GERS Bldg 2nd Fl                     | St Thomas      | VI    | 00802 |
| Office of the State Bank Commissioner     |   | 555 East Loockerman Street            |                                      | Dover          | DE    | 19901 |
| Board of Governors of Fed. Reserve System | Mark E. Van Der Weide Esquire             | General Counsel                       | 20th Street & Constitution Avenue NW | Washington     | DC    | 20551 |
| Jeanne R. Rentzelas Esquire               | Senior Vice President and General Counsel | Ten Independence Mall                 |                                      | Philadelphia   | PA    | 19106 |
| Office of Comptroller of the Currency     | Joseph M. Otting                          | 400 7th Street SW                     |                                      | Washington     | DC    | 20219 |
| U.S. Securities & Exchange Commission     | Hon. Jay Clayton                          | Chairman                              | 100 F Street NE                      | Washington     | DC    | 20549 |
| New York Department of Financial Services | Class Action Notice                       | One State Street                      | 19th Floor                           | New York       | NY    | 10004 |

# Attachment 2

**NOTICE ADMINISTRATOR FOR UNITED STATES DISTRICT COURT**

HILSOFT NOTIFICATIONS  
10300 SW Allen Blvd  
Beaverton, OR 97005  
P 503-350-5800  
DL-CAFA@epiqglobal.com

June 4, 2018

**VIA UNITED PARCEL SERVICE OR CERTIFIED MAIL**

**Class Action Fairness Act – Notice to Federal and State Officials**

Dear Sir or Madam:

Pursuant to the “Class Action Fairness Act,” (“CAFA”), 28 U.S.C. §1715, please find enclosed information relating to the proposed settlement of a class action lawsuit. This Notice is being sent on behalf of the following settling Defendants: Wilmington Trust Corp.; J.P. Morgan Securities LLC; Keefe, Bruyette & Woods, Inc.; David R. Gibson; Robert V.A. Harra, Jr.; William North; Kevyn N. Rakowski; Ted T. Cecala; Carolyn S. Burger; R. Keith Elliott; Donald E. Foley; Gailen Krug; Stacey J. Mobley; Michele M. Rollins; Oliver R. Sockwell; Robert W. Tunnell, Jr.; Susan D. Whiting; Rex L. Mears; and Louis Freeh.

- **Case:** In re Wilmington Trust Securities Litig. (Case No.: 10-CV-00990-ER).
- **Court:** United States District Court for the District of Delaware.
- **Judicial Hearing Scheduled:** A preliminary approval hearing has been set for July 2, 2018 at 2:00 PM before Judge Eduardo C. Robreno in Courtroom 15A, United States Courthouse, 601 Market Street, Philadelphia, PA. At this time, a Final Approval Hearing has not been scheduled by the Court. At the time of the hearing, these matters may be continued without further notice.
- **Documents Enclosed:** Copies of the following documents are contained on the enclosed CD in Adobe Acrobat PDF format:
  1. Consolidated Securities Class Action Complaint and three (3) Amended Consolidated Securities Class Action Complaints (with exhibits);
  2. Lead Plaintiffs’ Unopposed Motion for Preliminary Approval of Settlements and Approval of Notice to the Class, with all exhibits thereto, including:
    - a. Stipulation and Agreement of Settlement with Wilmington Trust Defendants and Underwriter Defendants (with exhibits);
    - b. [Proposed] Order Preliminarily Approving Settlements and Providing for Notice (with exhibits);
    - c. Forms of Notice;
    - d. [Proposed] Judgment Approving Class Action Settlement with Wilmington Trust Defendants and Underwriter Defendants;

**NOTICE ADMINISTRATOR FOR UNITED STATES DISTRICT COURT**

HILSOFT NOTIFICATIONS  
10300 SW Allen Blvd  
Beaverton, OR 97005  
P 503-350-5800  
DL-CAFA@epiqglobal.com

- e. Stipulation and Agreement of Settlement with KPMG (with exhibits);
  - f. [Proposed] Judgment Approving Class Action Settlement with KPMG; and
3. Brief in Support of Lead Plaintiffs' Unopposed Motion for Preliminary Approval of Settlements and Approval of Notice to the Class.
- **Location of Class Members and Proportionate Share of Claims:** CAFA requires a Defendant, "if feasible," to provide "the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement," or if that is not feasible, to provide "a reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement." See 28 U.S.C. §1715(b)(7)(A)-(B). In this Case, the names and State residences of the class members will not be known until after notice of the settlement is given and potential class members submit claim forms. Accordingly, it is not feasible at this time to provide a list of class members by State of residence, or a reasonable estimate of the number of class members residing in each State, or a reasonable estimate of the proportionate share of the claims of class members residing in each State to the entire settlement.

The foregoing information is provided based on information currently available to Defendants and their counsel, and the status of the proceedings at the time of the submission of this Notice.

Very truly yours,

Notice Administrator for United States District Court

Enclosures